

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
Caption in Compliance with D.N.J. LBR 9004-1	
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In re:  HOLLISTER CONSTRUCTION SERVICES, LLC, <sup>1</sup>  Debtor.	Chapter 11  Case No. 19-27439 (MBK)

**JOINDER OF PNC BANK, NATIONAL ASSOCIATION IN SUPPORT OF THE  
DEBTOR’S OBJECTION TO CROSS-MOTION OF THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS TO CONVERT DEBTOR’S CASE TO CHAPTER 7**

PNC Bank, National Association (“PNC”), by and through its undersigned counsel, hereby files this joinder (“Joinder”) in support of *Debtor’s Objection to Cross-Motion of the Official Committee of Unsecured Creditors to Convert Debtor’s Case to Chapter 7* [Doc. No. 418] (the “Debtor’s Objection”) filed by the above-captioned debtor (the “Debtor”). In support of this Joinder, PNC respectfully states as follows:

**JOINDER**

1. PNC hereby joins in the substantive arguments raised in the Debtor’s Objection and objects to the relief requested in the *Cross-Motion of the Official Committee of Unsecured Creditors (the “Committee”) to Convert Debtor’s Bankruptcy Case to Chapter 7* [Doc. No. 406] (the “Cross-Motion”).

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<sup>1</sup> The Debtor in this chapter 11 case and the last four digits of its taxpayer identification number is: Hollister Construction Services, LLC (5404).

2. At this stage of the Debtor's bankruptcy case, based on all information available to the parties at this time, substantial value for the estate and its creditors lies in the settlement protocol currently being pursued by the Debtor with project owners and subcontractors.

3. Conversion of this case to a chapter 7 proceeding would forestall, if not outright prevent, any opportunity of the estate to consummate such settlements.

4. Upon information and belief, PNC believes that the Committee has received additional financial information from the Debtor since the filing of the Cross-Motion, and that retention of the Committee's financial advisor is likely to be confirmed by this Court at the pending hearing on November 7, 2019.

5. Following such final retention, and the opportunity for the Committee and its financial advisor to review financial information made available by the Debtor, PNC believes that the concerns raised in the Committee's Cross-Motion will be substantially allayed.

6. In the interim, PNC believes that a conversion of the case to a chapter 7 proceeding at this time would pose a substantial detriment to the estate and its creditors.

7. PNC hereby reserves and preserves any and all rights to raise further objections to the Cross-Motion during the hearing on the Cross-Motion scheduled for November 7, 2019.

WHEREFORE, PNC respectfully requests that the Court deny the Cross-Motion seeking to convert the Debtor's chapter 11 bankruptcy case to a chapter 7 case and grant such other relief as is just and proper.

Respectfully submitted,

Dated: November 6, 2019

/s/ Sommer L. Ross

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